

Complaint - Exhibit B

November 3, 2013

To: Mr. Ron Lynch

From: Patrick L. Elwell

Subject: Use of Uniform Property Code 103704317322130119, Map 71, Tract 6 for the filming of "Lone Survivor" movie.

Mr. Lynch, per your e-mail dated 08/07/2013, to Mr. Nicholas Maniatis, Director New Mexico Film Office, I understand that you have received my supporting documents of ownership of Uniform Property Code 103704317322130119, Map 71, Tract 6, which was used by Georgia Film Fund Seventeen, LLC, for the production of the film titled "Lone Survivor." As of the date of this communication, I have not received any response from your office regarding this matter.

On that same date, during our telephone conversation, I requested a copy of the contract for the use of Uniform Property Code 103704317322130119, Map 71, Tract 6, which was not signed by the legal owner, Patrick L. Elwell, as noted on the Warranty Deed, which is filed with the Bernalillo County Clerk's Office in Albuquerque, New Mexico.

To this day, I have no idea who authorized your Production Company to use my property for the filming of the "Lone Survivor," nor have I personally authorized any person or organization to act in my absence or have Power of Attorney regarding the use of Uniform Property Code 103704317322130119, Map 71, Tract 6.

In my conversations with Location Managers of other production companies it is my understanding that one of the routine procedures for determining the ownership of selected sites is to research ownership of properties through official public records; in this case, the Bernalillo County Assessor's Office. In this instance, according to the Bernalillo County Location Filming Permit, Mr. Jonathan Slator was the Location Manager listed on the permit and obviously failed to conduct routine research regarding the ownership of Uniform Property Code 103704317322130119, Map 71, Tract 6, registered by Bernalillo County (See enclosed letter from Peter Auh, Deputy County Attorney, County of Bernalillo).

Mr. Lynch, again referring to our telephone conversation on 8/7/2013, (and I might add in your e-mails to Mr. Maniatis) you emphatically accuse me of "perpetuating a classic shake down," which I take to be a personal affront to my character and

reputation. I contend that you and Mr. Slator were involved in a classic shake down, but not by me, the official and lawfully recognized owner of Uniform Property Code 103704317322130119, Map 71, Tract 6.

I am now providing you an itemized statement for the privilege and use of my property, Uniform Property Code 103704317322130119, Map 71, Tract 6, during the filming of "Lone Survivor."

Please submit my invoice to your business office for prompt payment in the name of Patrick L. Elwell for the use of Uniform Property Code 103704317322130119, Map 71, Tract 6, for the filming of "Lone Survivor."

Respectfully,

Patrick L. Elwell

INVOICE FOR UTILIZATION OF PARCEL  
UNIFORM PROPERTY CODE 103704317322130119, Map 71, Tract 6,  
BY GEORGIA FUND SEVENTEEN FOR INTENT TO FILM  
"LONE SURVIVOR" - PROPERTY WARRANTY DEEDED  
TO  
PATRICK L. ELWELL

PROPERTY USAGE - 19 DAYS FILMING & PREP WORK ..... \$ 75,000  
\*RECLAMATION COSTS DUE TO DESTRUCTION OF  
NATURAL EROSION PREVENTION VEGETATION ..... \$ 85,000  
  
TOTAL ..... \$160,000

\*See Bernalillo County Location Filming Permit dated 10/9/2012, Item 9, where it is noted that there would be "no significant disturbance of terrain or vegetation."